

INSPECTION CHECKLIST  
AIR EMISSIONS STANDARDS  
FOR  
TANKS, SURFACE IMPOUNDMENTS AND CONTAINERS  
(Part 264/265 Subpart CC)

Note: Does not apply to satellite accumulation areas, containers less than 26 gal or small quantity generators.

Name of Facility --

Location of Facility --

Date of Inspection --

Name of Inspector --

**A. General**

1. If the facility claims that the Subpart CC regulations are not applicable to their waste management unit(s) or that the unit(s) are exempt from regulation, explain the reason for the claim.

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**B. Waste Determination**

**265.1084(a) (1)**

1. Does the facility determine the VOC content of its hazardous waste at the point of waste origination?      yes      no

**265.1084(a) (2)**

If yes, does the facility determine the VOC content of its hazardous waste by (a) direct measurement or (b) using knowledge of the waste (circle one)?

**265.1084(a) (4) (i)**

If (b), has the facility prepared and maintained records showing the information used as the basis for the O/O's knowledge of the hazardous waste stream's average VOC concentration?      yes      no

**265.1084(a) (3) (ii) (B)**

2. Were at least four representative samples collected within a year to determine VOC content?      yes      no      N/A

3. Does the facility perform any other waste determinations as required by the Subpart CC regulations?      yes      no

If yes, describe:

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**C. Tanks (40 CFR §265.1085)**

*skip this section if the facility does not use tanks for waste management*

1. Which of the following emissions control devices does the facility employ for its tanks that manage hazardous waste with a VOC concentration >500 ppmw (circle appropriate ones)
  - a. fixed roof (Level 1 control (265.1085(c)))
  - b. fixed roof equipped with an internal floating roof (Level 2 control (265.1085(d)))
  - c. external floating roof (Level 2 control)
  - d. tank vented through a closed vent system to a control device (Level 2 control)

- e. pressure tank (Level 2 control)
- f. tank located inside an enclosure that is vented through a closed-vent system to an enclosed combustion control device (Level 2 control)
- g. other
- h. none

If (g) other, describe:

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2. Does it appear as though the device(s) being used is designed and operated properly (i.e., no emissions were likely to occur)?    yes        no        N/A

If no, describe:

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**265.1084(c) (1)**

3. If a fixed-roof tank (Level 1 control) is used for storage of a hazardous waste with >500 ppmw VOC, is the maximum vapor pressure of the waste determined and the results maintained in the facility's records?        Yes        No        N/A

**265.1085(b) (2)**

4. Are tank(s) used for waste stabilization utilizing a Level 2 control?        Yes        No        N/A

**D. Surface Impoundments (40 CFR §265.1086)**

*skip this section if the facility does not use surface*

*impoundments for waste management*

1. Which of the following emissions control devices does the facility employ for its surface impoundments that manage hazardous waste with a VOC concentration >500 ppmw (circle appropriate ones)
  - a. floating membrane cover
  - b. cover that is vented through a closed-vent system to a control device
  - c. other
  - d. none

If (c) other, describe:

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2. Does it appear as though the device(s) being used is designed and operated properly (i.e., no emissions were likely to occur)?    yes    no    N/A

If no, describe:

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**E. Containers (40 CFR §265.1087)**

*skip this section if the facility does not use containers for waste management*

1. Which of the following emissions control devices does the facility employ for its containers that manage hazardous waste

with a VOC concentration >500 ppmw (circle appropriate ones)

- a. container meets DOT regulations - i.e., the container is closed and there are no visible holes, gaps, cracks or other openings in the container (Level 1 (265.1087(c)) or Level 2 (265.1087(d)) standard)
- b. cover and closure devices that form a continuous barrier over the container openings (Level 1 standard)
- c. organic-vapor suppressing barrier placed on or over the hazardous waste (Level 1 standard)
- d. container that operates with no detectable organic emissions as defined in §265.1081 (Level 2 standard)
- e. container demonstrated within the past 12 months to be vapor-tight (Level 2 standard)
- f. container that is vented directly through a closed-vent system to a control device (Level 3 (265.1087(e)) standard)
- g. container that is vented inside an enclosure which is exhausted through a closed-vent system to a control device (Level 3 standard)
- h. other
- i. none

If (h) other, describe:

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2. Does it appear as though the device(s) being used is designed and operated properly (i.e., no emissions were likely to occur)?    yes    no    N/A

If no, describe:

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**265.1087(b) (1) (i) & (ii)**

3. Are containers between 26 & 122 gallons not used for a waste stabilization process and containers greater than 122 gallons not in light material service provided with Level 1 control?
- Yes No N/A

*In light material service means the container is used to manage a material for which both of the following conditions apply: the vapor pressure of one or more of the organic constituents in the material is greater than 0.3 kilopascals (kPa) at 20 °C and the total concentration of the pure organic constituents having a vapor pressure greater than 0.3 kPa at 20 °C is equal to or greater than 20 percent by weight.*

**265.1087(b) (1) (iii)**

4. Are containers greater than 122 gallons in light material service provided with Level 2 control? Yes No N/A

**265.1087(b) (2)**

5. Are containers greater than 26 gallons used for a waste stabilization process provided with a Level 3 control?
- Yes No N/A

**F. Inspections & Monitoring**

*complete this section if the facility is using air emission controls*

**265.1089(b)**

1. Has the facility developed and implemented a written plan and schedule to perform all required inspection and monitoring activities of its air emissions control equipment?
- yes no

**265.1085(k) (1) & 265.1086(f) (1)**

2. In the event of a defect involving a tank or surface impoundment, did the facility make first repairs no later than

5 calender days after detection and complete repairs no later than 45 calender days after detection?

yes      no      N/A

**265.1087(c) (4) (iii) , 265.1087(d) (4) (iii)**

3. In the event of a defect involving a container using Container Level 1 or Level 2 controls, did the facility make first repairs no later than 24 hours after detection and complete repairs no later than 5 calender days after detection?

yes      no      N/A

**G. Recordkeeping**

**265.1084(a) (3) (ii) (C)**

1. Does the facility have a written sampling and analysis plan which describes the procedures by which representative samples will be collected and handled and is a copy maintained on-site?              yes      no

**265.1090(b) (1) (ii) & (c) (3)**

2. Does the facility maintain copies of inspection records, including dates of inspections and a description of defects and corrective actions taken to repair defects or problems involving its air emissions control equipment, for its tanks and surface impoundments?      Yes      No      N/A

**265.1087(c) (5)**

3. Does the facility maintain a copy of the procedure used to determine that containers 122 gal which do not meet applicable DOT regulations are not managing hazardous waste in light material service?      Yes      No      N/A

**265.1090(a)**

4. Are the above records maintained in the operating record for a minimum of three years?              yes      no      N/A

**Comments:**

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